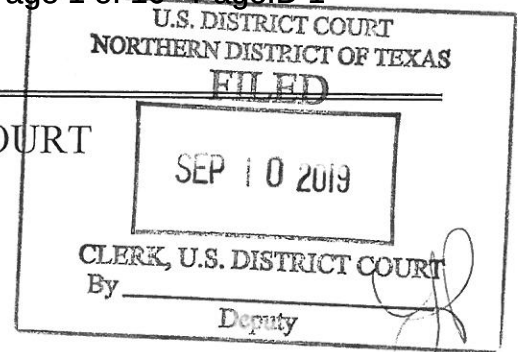


AO 91 (Rev. 11/11) Criminal Complaint

SEALED



## UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

Tremont Blakemore

Case No.

3-19MJ811-BT

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Feb. 2016 through Sept. 2018 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1591(a) and (b)(1)

Sex Trafficking Through Force, Fraud or Coercion

This criminal complaint is based on these facts:

See attached affidavit of Special Agent John Kochan.

☐ Continued on the attached sheet.

  
 Complainant's signature  
 SA John Kochan  
 Printed name and title

Sworn to before me and signed in my presence.

Date: 9.10.19City and state: Dallas, Texas

  
 Judge's signature  
 Magistrate Judge Rebecca Rutherford  
 Printed name and title

**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR CRIMINAL COMPLAINT**

I, John Kochan, a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Department of Homeland Security, HSI, in Dallas, Texas assigned to the North Texas Trafficking Task Force (NTTTF). I have been a criminal investigator for approximately ten years, with much of that time devoted to investigating crimes such as transnational gangs and criminal organizations, illicit narcotics smuggling, human smuggling and human trafficking. I have been the lead investigator for numerous investigations across multiple disciplines, with a focus on human trafficking.

2. I have received training from the Federal Law Enforcement Training Center on topics such as gang investigations, narcotics identification, narcotics smuggling, human smuggling and human (sex/labor) trafficking. As a law enforcement officer, I have used a variety of methods to investigate criminal activity, including, but not limited to, visual surveillance, victim/witness interviews, and the use of search warrants, confidential informants, and undercover agents.

3. In preparation for this affidavit, I have discussed the facts of this case with other law enforcement agents within HSI and the NTTTF. The information contained in

this affidavit is based upon my personal knowledge, information I received from victim/witness interviews, other law enforcement agents assisting in this investigation, records of Tremont **BLAKEMORE**'s previous encounters with law enforcement, and what I have learned from the other sources specifically discussed herein. This affidavit is intended to show only that there is probable cause for the requested warrant and does not set forth all my knowledge or investigation into this case.

4. Based on my training, experience and the facts as set forth in this affidavit, there is probable cause to believe that a violation of 18 U.S.C. § 1591, Sex Trafficking through Force, Fraud and Coercion has been committed by Tremont **BLAKEMORE** against Adult Victim 2 ("AV2") and others.

#### **PROBABLE CAUSE**

5. In February of 2019, HSI Special Agent (SA) John Jones initiated an investigation into an interstate human trafficking organization ("HTO") led by Tremont **BLAKEMORE** aka "*Macknificent*." **BLAKEMORE** and members of his HTO have previously been the subject of multiple federal and state investigations.

6. Since the initiation of the investigation by SA Jones in February of 2019, seven (7) adult trafficking victims of the HTO have been identified and interviewed. The adult victims have described being trafficked by the HTO across a time period spanning from as early as 2011 to as recently as September of 2018.

Blakemore's HTO as Described by Victims of Sex Trafficking

7. Each victim stated that the HTO is led by Tremont **BLAKEMORE** and it was most recently based out of the Dallas area.

8. Each victim stated that **BLAKEMORE's** HTO had multiple victims working for him simultaneously and all were completing commercial sex acts at his direction. Victims estimated that hundreds of women have been trafficked by **BLAKEMORE's** HTO.

9. Each victim stated that **BLAKEMORE** maintained strict control over HTO activities. **BLAKEMORE** required regular updates from victims via cellular telephone and text messages informing him which victims were completing commercial sex transactions, for how long, how much they earned, and other HTO business.

10. Each victim stated that **BLAKEMORE** required absolute loyalty from victims. Victims were not allowed to look at or speak to another man unless he was a commercial sex customer. Victims were not allowed to be close friends with each other or ever take the side of one another in any matter if the issue involved **BLAKEMORE**. **BLAKEMORE** doled out severe punishment when he found victims were "keeping secrets" or if they told each other something before it was communicated to him. Each victim described an environment of paranoia established by **BLAKEMORE** to ensure victims were informing on one another. **BLAKEMORE** encouraged victims to demonstrate their loyalty to him through the acceptance of branding tattoos bearing his "Macknificent" moniker.

11. The profitability of **BLAKEMORE's** HTO relied upon the completion of large numbers of commercial sex acts, and victims were expected to service multiple commercial sex customers each day. Each victim stated that they were given a daily quota of commercial sex proceeds, determined by **BLAKEMORE**, which they were required to earn. Multiple victims described a general quota of one thousand (\$1,000) dollars per day, though some described higher amounts. If victims did not meet their predetermined quotas, they were forced to continue working or suffer abuse from **BLAKEMORE**. Each adult victim stated that **BLAKEMORE** set the prices for commercial sex acts and all commercial sex proceeds were turned over to him.

12. Each victim described travelling across multiple states to complete commercial sex acts at **BLAKEMORE's** direction. The states included, but were not limited to, Texas, California, New York, Louisiana, Massachusetts, North and South Carolina, Florida, Missouri, Tennessee, Hawaii and Ohio. During their travel, victims were supervised by "group leaders" who were appointed by **BLAKEMORE**. Group leaders were senior or trusted victims who were tasked with collecting the commercial sex proceeds and transferring them back to **BLAKEMORE**. Commercial sex proceeds were transferred to **BLAKEMORE** through payment of HTO expenses, electronic transfers utilizing financial institutions, or by transporting them back to him as bulk cash.

13. Each victim stated that **BLAKEMORE's** HTO advertised commercial sex via the internet using a variety of commercial sex websites. These advertisements were paid for utilizing commercial sex proceeds. **BLAKEMORE's** HTO utilized a mixture of

photographs, some depicting true images of the victims, and others utilizing photographs of women found on the internet. Some victims stated that **BLAKEMORE** paid for professional photographs to be taken of them to be used in commercial sex advertisements.

14. Each victim stated that **BLAKEMORE's** HTO rented hotel rooms across the United States to be used for commercial sex dates. Hotel rooms were rented either by Group Leaders or by other HTO members who were tasked with making travel arrangements. Rooms were rented using commercial sex proceeds and the rooms were reserved under the name of victims who had valid identification documents.

15. Each victim stated that **BLAKEMORE's** HTO continually sought to recruit new victims. **BLAKEMORE** recruited victims himself and directed recruiting efforts by victims. Each victim stated that **BLAKEMORE** utilized social media websites and directed other HTO members to utilize social media websites to recruit additional victims. The victim's social media websites were monitored and curated by **BLAKEMORE** to purposefully give the illusion that they were living a lavish lifestyle provided by their membership in **BLAKEMORE's** HTO.

16. Each victim stated that **BLAKEMORE** used physical violence to coerce obedience from HTO members. The physical violence described included, but was not limited to, open handed slaps, choking, striking with closed fists, kicks, striking with various objects, and burning with cigarettes. Victims stated that assaults by

**BLAKEMORE** have resulted in significant injuries, including, but not limited to, black eyes, broken ribs, a broken jaw, a broken back, a broken nose, and burns.

17. Due to its dramatic nature and group setting, one particular instance of violent physical abuse was recalled by multiple victims. This physical assault was described by each victim and was administered by **BLAKEMORE** as a result of the victim expressing a desire to leave the HTO and have a family. During this incident, **BLAKEMORE** started striking the victim with closed fists and kicking her. Throughout the assault, **BLAKEMORE** lectured her and the other victims present that they should be content with the life he provided. During a pause in the violence, the victim tried to escape and ran from the room. **BLAKEMORE** grabbed her and “body slammed” her into an air conditioning unit. When she could not stand up, **BLAKEMORE** began kicking her. **BLAKEMORE** began yelling at her to get up and she told him that she could not because she thought he broke her back. **BLAKEMORE** grabbed her by the hair and pulled her to her feet. When **BLAKEMORE** turned away she was able to escape to the front desk of the hotel. When **BLAKEMORE** came to the front desk, she told him she already called law enforcement. When **BLAKEMORE** left, she drove herself to the hospital where she sought treatment for injuries to her face and severe back injuries. She believed **BLAKEMORE** did this in front of other HTO members to “make an example” so others would be afraid to talk about a life outside of **BLAKEMORE**’s control.

18. Each victim stated that they engaged in sexual intercourse with **BLAKEMORE**. Victims have stated that sexual intercourse with **BLAKEMORE** was

required and non-consensual. Victims were either physically forced to have sex with him or did so because they knew that if they refused, they would be subject to additional abuse later. **BLAKEMORE** had absolute rules against victims speaking to one another about their relationship with him.

19. Each victim stated that **BLAKEMORE** prevented victims from leaving through the application of both physical and emotional abuse.

Corroboration of Sex Trafficking Victim Statements by Investigators

20. Investigators have corroborated the statements made by victims identifying **BLAKEMORE** as head and director of a large interstate HTO, based out of Dallas, Texas. Investigators have reviewed multiple returns from state and federal search warrants executed against social media accounts and cellular telephones recovered from both **BLAKEMORE** and victims. Photographs preserved both on social media websites and in cellular telephones show **BLAKEMORE** pictured with each of the victims interviewed thus far in the investigation and other victims identified, but not yet interviewed.

21. Communications sent via text message and over social media positively identify **BLAKEMORE** as the head of the HTO. For example, on August 14, 2018, **BLAKEMORE** sent the following group text message to approximately nineteen (19) HTO members:

*“People are starting to really test my patience by not following instructions and doing things without talking to me or my permission... Let me explain this if everybody does what they wanted to do when they wanted to do shit*



*we wouldn't be shit. I designed the way we run this program through years of fuck up mistakes and altering things so that it could run properly... People that are bigger than my rules will be exempt from my program no matter how long you've been here and I'm going to make an example out of someone soon... People sneaking trying to talk to nothing ass niggas, going to clubs without permission, drinking without permission, People are getting really bold someone said I don't care tell Daddy I'm not scared to me that's saying I can buck this program and fuck what he says lol ok cool we're going to see how much they don't care when I call there bluff... This is getting out of control yet we have some people here that abide by all rules, respect me as they should and make the whole program go smooth some want to use there own rules every time someone does that I lose something for them and after it constantly happens it makes it easy to say (peace sign) I will not continue to tolerate disrespect that's one of my biggest pet peeves especially coming from people who've been here they break the rules and others think it's cool cause It came from the rotten apple. You've been warned I will be respected if nothing else!"*

Based upon intelligence developed during the investigation and context developed through additional text messages, I believe that the text message above reveals

**BLAKEMORE** identifying himself as the head of the HTO and expressing frustration that victims are not following “*the program*” or rules that he developed to run the HTO.

In the text message, **BLAKEMORE** references a victim referring to him as “*Daddy*.”

Based upon my training and experience, this is a common term in human trafficking that refers to the pimp or head of an HTO.

22. Investigators have corroborated statements made by victims claiming that **BLAKEMORE** maintained strict control over HTO activities both locally and when victims were travelling to different states to complete commercial sex acts. Investigators have reviewed forensic downloads of cellular telephones seized from **BLAKEMORE**

and victims. These searches revealed text messages between **BLAKEMORE** and large groups of victims. **BLAKEMORE** received regular updates from victims on when and where they were completing commercial sex transactions, how long they took, how much commercial proceeds were earned, along with other HTO business. A text message was recovered from a victim's phone that was sent by **BLAKEMORE** to a large group of victims on August 13, 2018, stating: *"I haven't received one text since they made it phone call or nothing people need to check-in I got people when they're out of town let me know there every move and that's the way it should be not just moving around doing wtf ever."* Investigators have also recovered multiple text messages of images sent by **BLAKEMORE** to victims during which he divided them into teams and assigned them cities to which they would travel to complete commercial sex acts for the HTO.

23. Investigators have corroborated statements made by victims stating that **BLAKEMORE** required absolute loyalty from victims. Multiple text messages have been recovered from victim's phones that detail **BLAKEMORE**'s emphasis on loyalty to himself and the HTO. A text message was recovered from a victim's phone that was sent from **BLAKEMORE** to a large group of victims on August 11, 2018, stating: *"I don't Play with out of pocket bitches loyalty is everything to me."* Investigators have interviewed multiple victims still bearing the branding tattoo **BLAKEMORE** encouraged to demonstrate loyalty. The image below was taken by investigators of a tattoo borne by one of **BLAKEMORE**'s victims.



24. Investigators have corroborated statements made by victims claiming that **BLAKEMORE** set prices to be charged and quotas of commercial sex proceeds to be earned, and also required victims to complete large numbers of commercial sex acts per day. On August 5, 2018, **BLAKEMORE** sent via group text message to multiple victims: *"We're not doing that no more \$120 \$200 is out \$200 is out period flood the market I don't care who you think you are \$100 half \$150 full period"* Based on intelligence developed during the investigation and context from other text messages, I believe that **BLAKEMORE** is instructing victims to charge commercial sex customers one hundred (\$100) dollars for one half hour and one hundred fifty (\$150) dollars for one full hour. *"Flooding the market"* refers to **BLAKEMORE** telling the victims that they are to complete multiple commercial sex acts at this lowered price to drive out competition. On April 7, 2018, **BLAKEMORE** sent via group text message to multiple victims: *"we need to be bringing in 100k a week those don't like working need day jobs"*

*focus on bring in no less than 6 or 7 bands a week.*” Based upon my experience, I believe that “bands” refer to one thousand (\$1,000) dollars in commercial sex proceeds.

25. Investigators have corroborated statements made by victims claiming that victims crossed multiple states completing commercial sex acts at **BLAKEMORE’s** direction. Investigators have preserved hotel reservations, flight information, and commercial sex advertisements from other states as victims travelled to complete commercial sex acts for the HTO. Investigators have collected reports created by local agencies in different states when victims were arrested for prostitution during the time period in which they were trafficked by **BLAKEMORE**. Investigators have conducted surveillance operations and interviewed victims of **BLAKEMORE’s** HTO during interstate travel in furtherance of commercial sex activity. Investigators have also analyzed the forensic download of cellular telephones belonging to victims containing GPS information placing them in different states as they communicated with commercial sex customers, completed commercial sex acts and received direction from **BLAKEMORE**.

26. Investigators have corroborated statements made by victims claiming that commercial sex proceeds were transferred to **BLAKEMORE** through payment of HTO expenses, electronic transfers utilizing financial institutions, or by transporting them back to him as bulk cash. Investigators have analyzed the forensic download of cellular telephones belonging to victims and recovered images and text messages detailing the transfer of commercial sex proceeds, the payment of HTO expenses and electronic

transfers of proceeds utilizing financial institutions. Investigators have recovered pictures of receipts confirming the transfer of commercial sex proceeds to HTO members by victims. Investigators have recovered text messages instructing victims to use commercial sex proceeds to pay bills for the HTO.

27. Investigators have corroborated statements made by victims claiming that **BLAKEMORE's** HTO advertised commercial sex over the internet using a variety of websites. Commercial sex advertisements have been linked to the HTO through investigative methods including, but not limited to, querying the native numbers of cellular telephones recovered from victims, analysis of electronic devices seized during search warrants resulting in the recovery of preserved advertisements, image searches for advertisements featuring the true images of identified victims and subpoenas sent to known commercial sex websites. These investigative methods have resulted in the discovery of hundreds of commercial sex advertisements linked to **BLAKEMORE's** HTO. These commercial sex advertisements were posted on the websites Backpage, City X Guide, Eros Guide, Adult Search, Locanto, Skip the Games, List Crawler, and others.

28. Investigators have corroborated statements made by victims claiming that **BLAKEMORE's** HTO rented hotel rooms across the United States to be used for commercial sex dates. Investigators have recovered reservation information both through subpoenas submitted to hotels and through hotel information recovered from victim's cellular telephones.

29. Investigators have corroborated statements made by victims claiming that **BLAKEMORE**'s HTO utilized social media to recruit new victims. Investigators have discovered and reviewed multiple social media accounts across different websites. Both state and federal search warrants have been executed, preserving the social media accounts. On social media, **BLAKEMORE** refers to himself by the moniker "*Macknificent*" and his victims as the "*Macknificents*." Multiple victim social media accounts have been discovered bearing the victim's nickname followed by the surname "*Macknificent*" or "*Mack*." HTO members are depicted in photographs selected to give the appearance that they are living a lavish lifestyle. These images frequently feature large amounts of currency and expensive vehicles. Victims are depicted promoting the HTO through the use of hand signs representing an "M" and displaying their branding tattoos bearing **BLAKEMORE**'s moniker "*Macknificent*." On April 10, 2018, **BLAKEMORE** sent out a group message to multiple victims regarding the use of the social media website Facebook and using it for other than HTO purposes. The text message stated: "*Our pages are like a business for entertainment and recruiting purposes that is not recruiting niggas neither if it don't make dollars it don't make sense to me.*"

30. Investigators have corroborated statements made by victims claiming **BLAKEMORE** used physical violence to coerce obedience from HTO members. Investigators interviewed multiple victims present during the aforementioned air conditioning unit assault, including the witness whose statements to **BLAKEMORE** initiated the assault. Investigators have collected hospital records made the night of the

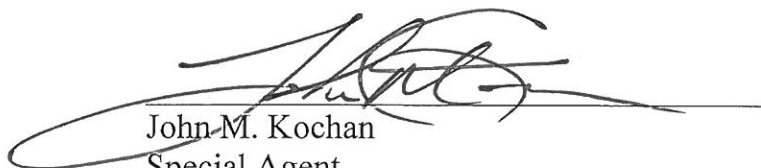
39. **BLAKEMORE** encouraged AV2 to accept a branding tattoo bearing his moniker “Macknificent” after approximately one year as a victim of the HTO.

40. AV2 stated that **BLAKEMORE** used multiple methods to prevent her from leaving. **BLAKEMORE** told her that if she ever tried to leave, she would fall back into her addiction to narcotics, become homeless, and no one would ever want her because she was a prostitute.

41. AV2 stated that when she escaped from the HTO she left destitute, with no money and ruined credit. AV2 stated that she still fears **BLAKEMORE** and believes he would harm her if he knew she was cooperating with law enforcement.

#### CONCLUSION

42. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that beginning in or around February of 2016 until on or about September 18, 2018, within the Dallas Division of the Northern District of Texas and elsewhere – **Tremont BLAKEMORE (aka “Macknificent”)** committed the offense of Sex Trafficking Through Force, Fraud or Coercion, a violation of 18 U.S.C. §§ 1591(a) and (b)(1) as related to AV2.



John M. Kochan  
Special Agent  
Department of Homeland Security  
Homeland Security Investigations

Subscribed and sworn before me this 10 day of September, 2019.



The Honorable Rebecca Rutherford  
United States Magistrate Judge